JOINT LETTER

August 28, 2020

Via ECF
Honorable Judith C. McCarthy
United States District Court
300 Quarropas Street
White Plains, NY 10601-4150

Re: Holland v. Matos, et al., 18 Civ. 6697 (KMK) (JCM)

Your Honor:

The undersigned counsel for all parties write to update the Court regarding the status of discovery in this action. The parties have concluded depositions. Following the last deposition on August 25, 2020, Plaintiff wrote to Defendants regarding certain documents, which Plaintiff believes that Defendants have failed to produce. The parties continue to confer regarding those documents and respectfully request a one-week extension to conclude fact discovery.

In light of the above, the parties request that the Court extend the deadline to complete fact discovery until September 4, 2020.

Respectfully submitted,

SCOTTHULSE, PC Luis F. Calvo One San Jacinto Plaza 201 E. Main Drive, Suite 1100 El Paso, Texas 79901 (915) 533-2493 Attorneys for Greg Holland Kramer Levin Naftalis & Frankel LLP Michael Cohen 1177 Avenue of the Americas New York, New York 10036 (212) 715-9230 Attorneys for Thomas Matos, Nanci Matos & BestLife Gifts, LLC

SO ORDERED:

Application granted. The deadline to complete fact discovery and the deadline for the corporate defendants to retain counsel for all purposes are both extended to September 4, 2020. The parties are directed to provide a further status update to the Court on September 4, 2020.

Clusith C. M. Carthy

8-28-2020

JUDITH C. McCARTHY United States Magistrate Judge